

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

T.R.,

Plaintiff,

v.

No. 2:20-CV-00276-GBW-JHR

**PATRICK HOWARD and
LAS CRUCES PUBLIC SCHOOLS,**

DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

COMES NOW Defendant, Patrick Howard, by and through his counsel Stiff, Garcia & Associates (John S. Stiff, Sr., Esq. and H. Nicole Werkmeister, Esq.), and proposes that the Court ask the following of prospective jurors, with appropriate supplemental questions from counsel depending on potential juror response.

1. Are you or someone close to you involved in law enforcement?
2. Are you or someone close to you involved in education or schools?
3. Have you or someone close to you been sexually assaulted?
4. Have you or someone close to you been accused of sexual assault?
5. Have you or someone close to you been a victim of a crime?
6. Have you or someone close to you been accused of a crime?
7. Do you have any children? What are the age and sex of the you children.
8. Have you heard anything about Patrick Howard in the media? Have you formed an opinion as a result?
9. There has been media attention regarding claims of child molestation such as the Michael Jackson case. Will the media attention on this issue affect your ability to sit as an impartial juror?

Defendant proposes that counsel be permitted to ask the following of prospective jurors, with appropriate supplemental questions depending on potential response.

10. Do you believe every person is entitled to exercise their rights under the constitution?
11. Do you believe that a person who exercises their rights under the Fifth Amendment not testify is guilty of something?
12. Do you believe that a person who has pled guilty to criminal sexual contact with a minor necessarily should be punished in his civil trial if he has already been punished in the criminal case?
13. Do you know of any of the following witnesses who will appear at trial?
14. Do you know any of the lawyers?

Respectfully submitted,

STIFF, GARICA & ASSOCIATES, LLC

By: /s/ John S. Stiff
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 20th day of February 2024, the foregoing was electronically filed through the ECM/ECF system, which caused the parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ John S. Stiff
John S. Stiff
H. Nicole Werkmeister